

CHARLES LAW, P.C.

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Member of the New York Bar

May 23, 2025

Via ECF Only

Honorable Katherine H. Parker
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

Re: *Muhammad et al., v. Alto Pharmacy, LLC et al.*,
Civil Action no.: 1:23-cv-11315 (KHP)

Dear Judge Parker:

We represent plaintiffs Affiyfah Muhammad (“Muhammad”), Dominique Skinner (“Skinner”), and Darwin Wilson (“Wilson”)(collectively, the “Plaintiffs”) in the above- referenced action. We respectfully request an extension of time to complete depositions, from June 20, 2025 to July 22, 2025, and to request an extension of time of two (2) weeks to meet and confer with defendant Alto Pharmacy LLC (“Alto”) regarding revisions to the collective class notices. The reason for this request—Plaintiffs have recently retained co-counsel to assist current counsel in this action. This is Plaintiffs’ first request for an extension of time to meet and confer to file revised notices, and second request for an extension of time to complete depositions.

Alto Pharmacy did not respond to Plaintiffs’ request for consent.

On May 1, 2025, this Court issued an order granting Plaintiffs’ motion for conditional collective class certification, and granting Plaintiffs leave to distribute notice of this action to all couriers who worked for Alto in New York City from January 1, 2021, to July 15, 2024. (ECF No. 95). Likewise, Plaintiffs request an extension of time until July 22, 2025, to complete depositions. On April 22, 2025, this Court ordered that Alto’s depositions of the named plaintiffs and Plaintiffs’ 30(b)(6) deposition of Alto be completed by June 20, 2025. (ECF No. 91). Plaintiffs request the additional time to allow newly retained co-counsel to fully participate in these matters. Plaintiffs do not anticipate any further requests for extensions of time.

Thank you for your attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "F Charles", with a stylized flourish at the end.

Fred V. Charles, Esq.

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